

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**NOTICE OF INTENT TO RESPOND AND/OR OBJECT TO REQUESTS TO SEAL
EXHIBITS AND/OR DEPOSITION TESTIMONY**

Plaintiffs hereby provide notice of their intent to file responses or objections to the requests to seal exhibits, testimony, or information filed by Google and various non-parties. *See* ECF Nos. 1594, 1595, 1596, 1600, 1603, 1607, 1608, 1611, 1616, 1621, 1624, 1630, 1633, 1636, 1643, 1648, 1649, 1657, 1660, and 1677. Plaintiffs intend to provide their responses and/or objections on Friday, September 12, 2025, in accordance with the Court’s Order Regarding Pre-Trial Schedule and Procedures. *See* ECF No. 1560, para. 4 (“All objections or responses to any party’s or third party’s proposed redactions or requests to seal confidential information in any respect shall be filed on Friday, September 12, 2025.” (emphasis in original)).¹

¹ To the extent recently entered orders on various non-party motions concerning sealing (for example, ECF Nos. 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, and 1696) are to govern the treatment of confidential information at trial, Plaintiffs reserve the right to object pursuant to Fed. R. Civ. P. 72(a) and Local Civil Rule 72.

Dated: September 9, 2025

Respectfully submitted,

ERIK S. SIEBERT
United States Attorney

/s/ Gerard Mene
GERARD MENE
Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3777
Facsimile: (703) 299-3983
Email: Gerard.Mene@usdoj.gov

/s/ Julia Tarver Wood
JULIA TARVER WOOD
DAVID A. GEIGER
MILOSZ GUDZOWSKI
MATTHEW R. HUPPERT
DAVID M. TESLICKO
MICHAEL E. WOLIN

United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington DC 20530
Telephone: (202) 307-0077
Facsimile: (202) 616-8544
Email: Julia.Tarver.Wood@usdoj.gov

Attorneys for the United States

JASON S. MIYARES
Attorney General of Virginia

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenry@oag.state.va.us

Attorneys for the Commonwealth of
Virginia and local counsel for the
States of Arizona, California,
Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska,
New Hampshire, New Jersey, New York,
North Carolina, Rhode Island,
Tennessee, Washington, and West
Virginia